



AQUALLIANCE
DEFENDING NORTHERN CALIFORNIA WATERS



CRAB BOAT OWNERS ASSOCIATION, Inc.
2907 Jones Street
San Francisco, California 94133-1115
415-885-1180

CA Save Our Streams Council



NORTH
COAST
RIVERS
ALLIANCE



December 1, 2014

Karl E. Longley, Chairman
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, #200,
Rancho Cordova, California 95670-6114
E-mailed to: Margaret.Wong@waterboards.ca.gov

Re: Draft Waste Discharge Requirements General Order for Growers in the Grasslands Drainage Area

Dear Chairman Longley and Members of the Regional Board;

Thank you for the opportunity to comment on the draft Waste Discharge Requirements General Order for growers in the Grasslands Drainage Area (GDA WDR). As stated in

paragraph 1 of the Draft WDR:

“This Order serves as general waste discharge requirements (WDRs) for waste discharges from irrigated land within the Grassland Drainage Area (GDA) that could affect groundwater of the state. The discharges result from leaching of irrigation water, subsurface drain water, and/or stormwater from agricultural lands that are not captured by subsurface drainage systems in the GDA. Such discharges can reach waters of the state directly or indirectly.”

It is our understanding that this Draft WDR does not cover discharges of waste that are regulated under other Central Valley Water Board issued WDRs or conditional waiver of WDR, including but not limited to discharges from the Grasslands Bypass Project.

We are dismayed that the CVRWQCB's proposal to regulate the discharge of pollutants to groundwater in the GDA does not include selenium, boron, arsenic, mercury and pesticides. Given the Regional Board's extensive efforts to reduce the discharge of selenium and boron through the Grasslands Bypass Project, it is unfathomable that there is no requirement whatsoever to regulate the discharge of those constituents into the groundwater of the GDA. It is a free pass to pollute groundwater with selenium, boron, arsenic, mercury and pesticides.

We have also yet to see the final WDR for the Grasslands Bypass Project, but based on the May 2014 draft, there are significant omissions in surface water and groundwater quality regulation for the Grasslands Drainage Area (GDA). For instance, irrigators in the Almond Drain and Poso Drain areas remain unregulated for surface discharges of drainwater and there is also no monitoring of their groundwater for selenium and boron. We therefore question why there is not a single WDR for groundwater and surface water discharges of agricultural waste within the GDA?

It is particularly important to monitor selenium, salt and boron in GDA groundwater because of the concentration and accumulation of polluted agricultural drainage in the reuse area, otherwise known as the San Joaquin River Water Quality Improvement Project (SJRIIP). The SJRIIP is a sump for concentration of contaminated drainage where salt tolerant crops are grown. How will the CVRWQCB and the public know the real results of years of accumulating these toxins in groundwater if there is no monitoring? If the SJRIIP is not covered by this proposed WDR and there is no groundwater monitoring of selenium within the GDA, how can the public determine the fate and concentration of selenium and other wastes from reuse irrigation practices on groundwater quality?

Therefore, we strongly urge the CVRWQCB go back to the drawing board to incorporate this proposed General Order WDR into the proposed WDR for the Grasslands Bypass Project. It makes little sense to bifurcate discharges of agricultural wastes from the same lands into two separate WDR's- one for groundwater and another for surface discharges. The proposed General Order WDR and the proposed WDR for the Grasslands Bypass Project creates a duplicative, confusing and inadequate regulatory structure to protect surface and groundwater quality within the Grasslands Drainage Area.

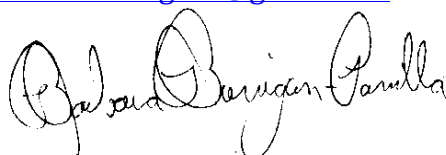
Sincerely,



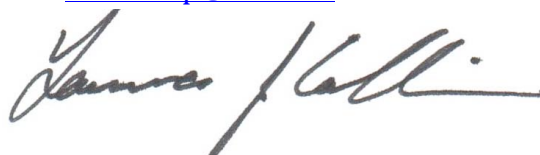
Carolee Krieger
Board President and Executive Director
California Water Impact Network
Caroleekrieger7@gmail.com



Bill Jennings
Chairman and Executive Director
California Sportfishing Protection Alliance
deltakeep@me.com



Barbara Barrigan-Parrilla
Executive Director
Restore the Delta
barbara@restorethedelta.org



Larry Collins
President
Crab Boat Owners Association Inc.
lcollins@sfcabboat.com



Jonas Minton
Senior Advisor
Planning and Conservation League
jminton@pcl.org

Lloyd Carter
President
Save Our Streams Council
lcarter0i@comcast.net



Conner Everts
Executive Director
Southern California Watershed Alliance
& Environmental Water Caucus
connere@gmail.com

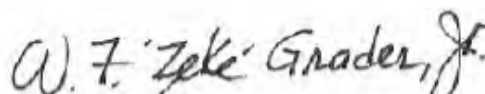


Barbara Vlamis
Executive Director
AquAlliance
barbarav@aqualliance.net

Fred Egger, President
North Coast Rivers Alliance
fegger@pacbell.net



Caleen Sisk
Chief of the Winnemem
Wintu Tribe
caleenwintu@gmail.com



Zeke Grader, Executive Director
Pacific Coast Federation of Fishermen's
Associations and Institute for
Fisheries Research
zgrader@ifrfish.org

A handwritten signature in black ink that reads "John McManus". The signature is written in a cursive, flowing style.

Stephen Green, President
Save the American River Association
gsg444@sbcglobal.net

John McManus, Executive Director
Golden Gate Salmon Association
johnmcmanus103@gmail.com